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April 6, 2017
VIA ECF

Hon. Michael A. Hammer
United States Magistrate Judge
United States District Court
for the District of New Jersey
Martin Luther King Building
& U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: Accurate Abstracts, LLC v. Havas Edge, LLC
Civil Action No. 2:14-cv-01994 (KM)(MAH)

Dear Magistrate Judge Hammer:

We represent defendant Havas Edge, LLC ("Defendant") in the above-referenced matter. We write to request an adjournment of the deadline for filing motions for summary judgment, currently set for April 21, 2017, pending the Court's determination of Defendant's **unopposed** Motion to Strike the Amended Expert Report of Rick Dove. (ECF No. 59). We believe clarity is needed concerning the admissibility of Mr. Dove's proposed amended report before summary judgment motions are filed to avoid unnecessary confusion inasmuch as Plaintiff's reliance on such proposed amended report could have a material impact on the substance of the summary judgment briefing by the parties. Alternatively, since Plaintiff has filed no opposition to Defendant's above-referenced Motion, the Court could moot this request by simply granting Defendant's Motion to Strike.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

DLA Piper LLP (US)

A handwritten signature in blue ink, appearing to read 'Dan', followed by a stylized flourish.

Daniel Turinsky
Partner

cc: Anthony Ambrosio, Esq. (via ECF)